UNITED STATES DISTRICT OF		
UNITED STATES OF AMI	ERICA, Plaintiff,	NOTICE OF MOTION TO FILE UNDER SEAL
TORIN J. FINVER,	Defendant.	CASE NO. 18-MJ-05282-MJR-1
STATE OF NEW YORK COUNTY OF ERIE CITY OF BUFFALO)) ss:)	

BARRY NELSON COVERT, ESQ., being duly sworn, deposes and says:

- 1. I represent the defendant Torin Finver.
- 2. Your deponent requests that the defendant's Notice of Motion for Release from Custody be filed under seal because the information set forth therein deals with issues in the case that should not be made available to the public.

WHEREFORE, your deponent prays that this Court rule accordingly.

DATED: Buffalo, New York Respectfully submitted, June 21, 2019

/s/Barry Nelson Covert

BARRY NELSON COVERT, ESQ. LIPSITZ GREEN SCIME CAMBRIA LLP

Attorneys for Defendant TORIN J. FINVER

Office and Post Office Address 42 Delaware Avenue, Suite 120 Buffalo, New York 14202

(716) 849-1333 bcovert@lglaw.com

Subscribed and sworn to before me this 21st day of June, 2019.

/s/Kristina Drewery

Commissioner of Deeds, Qualified in Erie County My Commission Expires December 31, 2020 TO: JOSHUA A. VIOLANTI, ESQ.
ASSISTANT UNITED STATES ATTORNEY
Federal Centre
138 Delaware Avenue
Buffalo, New York 14202